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PRE-APPEAL BRIEF REQUEST FOR REVIEW

Docket Number (Optional)	
1376.0100420	

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on June 12, 2006

Signature Molly K. Harrison

Typed or printed name Molly K. Harrison

Application Number	Filed
10/052,053	January 17, 2002

First Named Inventor: Daniel WONG

Art Unit	Examiner
2624	Phuoc TRAN

Applicant requests review of the final rejection in the above-identified application. No amendments are being filed with this request.

This request is being filed with a notice of appeal.

The review is requested for the reason(s) stated on the attached sheet(s).
Note: No more than five (5) pages may be provided.

I am the

- ☐ applicant/inventor.
- ☐ assignee of record of the entire interest. See 37 CFR 3.71. Statement under 37 CFR 3.73(b) is enclosed. (Form PTO/SB/96)
- ☑ attorney or agent of record. Registration number 42,146
- ☐ attorney or agent acting under 37 CFR 1.34. Registration number if acting under 37 CFR 1.34 _____

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June 12, 2006
Date

NOTE: Signatures of all the inventors or assignees of record of the entire interest or their representative(s) are required. Submit multiple forms if more than one signature is required, see below*.

☐ *Total of _____ forms are submitted.

PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant:	Daniel WONG, et al.		
Title:	SYSTEM FOR HANDLING MULTIPLE DISCRETE COSINE TRANSFORM MODES AND METHOD THEREOF		
App. No.:	10/052,053	Filed:	January 17, 2002
Examiner:	Phuoc TRAN	Group Art Unit:	2621
Customer No.:	34456	Confirmation No.:	1448
Atty. Dkt. No.:	ATI.0100420 (1376-0100420)		

Mail Stop AF
Commissioner for Patents
PO Box 1450
Alexandria, VA 22313-1450

REMARKS IN SUPPORT OF THE PRE-APPEAL BRIEF REQUEST FOR REVIEW

Dear Sir:

In response to the Final Office Action mailed January 12, 2006 (hereinafter, "the Final Action") and the Advisory Action mailed April 6, 2006, and pursuant to the Notice of Appeal and Pre-Appeal Brief Request for Review submitted herewith, the Applicant requests review of the following issues on appeal.

Anticipation Rejection of Claims 1-2, 4-8, 19, and 21-23

At page 3 of the Office Action, claims 1-2, 4-8, 19, and 21-23 are rejected under 35 U.S.C. § 102(b) as being anticipated by Jang (U.S. 5,481,487). Claim 1 recites "when in a first mode of operation, accessing table data in a table in a first manner to perform a first transform of the first data; and when in a second mode of operation, accessing table data in the table in a second manner to perform a second transform of the first data, wherein the second transform is an inverse transform relative to the first transform." These elements are not disclosed or suggested by Jang.

According to the Final Action at page 2, these elements are disclosed by item 140 of Jang. However, Jang clearly discloses that item 140 may be either a DCT circuit *or* an IDCT circuit. According to Jang, "FIG. 4 shows a 2-D DCT/IDCT architecture 100 according to the present invention. As shown, the 2-D DCT/IDCT architecture 100 *has a 1-D DCT or IDCT* circuit 110 as before which outputs intermediate matrices Y in row-column y.sub.0, y_1, y_2, . . ., y_{63} (*in the case of a DCT circuit 110*) or shuffled row-column order y_0, y_7, y_1, y_6, y_2, y_6, . . ., y_{60} (*in the case of an IDCT circuit 110*)." *Jang*, col. 9, lines 6-12 (emphasis added). Jang further states "[t]he transpose memory 120 outputs the matrices y^t in shuffled column row order to the DCT circuit 140 (or column row order *in the case of an IDCT circuit 140*)." *Id.*, col. 9, lines 16-18 (emphasis added). Thus, Jang clearly states that the circuit 140 is **either** a DCT circuit **or** an IDCT circuit. Jang does not disclose that the circuit 140 can perform as both a DCT circuit and an IDCT circuit, depending on a mode of operation of the Jang system. In fact, Jang does not disclose different modes of operation at all. Accordingly, Jang fails to disclose when in a first mode of operation, accessing table data in a table in a first manner to perform a first transform of the first data; ***and*** when in a second mode of operation, accessing table data in the table in a second manner to perform a second transform of the first data, wherein the second transform is an inverse transform relative to the first transform. Accordingly, Jang fails to disclose each and every element of claim 1.

Claims 2 and 4-8 depend from claim 1. Accordingly, Jang fails to disclose each and every element of these claims, at least by virtue of their dependency on claim 1. Further, claims 2 and 4-8 recite additional non-obvious features.

With respect to claim 19, the claim recites "a table access component to: access said table in a first manner to perform a first transform, access said table in a second manner to perform a second transform, wherein the second transform is an inverse transform relative to the first transform." Jang does not disclose this element. Further, the Final Action does not point to any portion of Jang that discloses this element. As explained above, Jang does not disclose a circuit that can perform both a first transform and an inverse transform relative to the first transform. Accordingly, Jang necessarily fails to disclose a table access component that can perform two different transforms in different manners, where one transform is the inverse of the other transform. Therefore, Jang fails to disclose or suggest each and every element of claim 19.

Claims 21-23 depend from claim 19. Accordingly, Jang fails to disclose each and every element of these claims, at least by virtue of their dependency on claim 19. Further, claims 21-23 recite additional non-obvious features.

In view of the forgoing, it is respectfully submitted that the obviousness rejection of claims 1-2, 4-8, 19 and 21-23 is improper. Withdrawal of this rejection and reconsideration of the claims therefore is respectfully requested.

Anticipation Rejection of Claims 9, 12-16, and 24-27

At page 4 of the Final Action, claims 9, 12-16, and 24-27 are rejected under 35 U.S.C. § 102(e) as being anticipated by Chen (U.S. 6,618,442). Claim 9 recites "when in a first mode of operation, accessing one of the first table or the second table in a first manner to perform a first transform; and when in a second mode of operation, accessing one of the first table or the second table in a second manner to perform a second transform, wherein the second transform is an inverse transform relative to the first transform." Chen does not disclose these features but instead discloses a system that performs a single type of transform. Chen discloses, at FIG. 4, a method for applying a transform to a video signal. *Chen*, FIG. 4. At decision block 410 determines whether to perform 8x8 IDCT transform or a 2-4x8 IDCT operation. *Id.* Chen states

> A test is made to determine the DCT mode used to encode the video signals at step 410. There are two types of IDCT processes, namely the 8 X 8 IDCT and 2-4 X 8 IDCT. If 8 X 8 DCT encoding was utilized in creating the DV encoded signal, the 8 X 8 IDCT is performed at step 412. If the 2-4 X 8 DCT encoding was utilized, however, the 2-4 X 8 IDCT process is performed at step 414. Both modes yield an 8 X 8 block of pixel values.

Chen, col. 4, line 66 – col. 5, line 6. Accordingly, Chen does not disclose a system or method that performs a first transform in one mode of operation and a second transform in a second mode of operation wherein the second transform is an inverse transform relative to the first transform. Thus, the Chen system performs a single type of transform (specifically, an IDCT transform). The parameters of the IDCT transform may differ depending on the parameters of the DCT transform used to encode the received information, but the type of transform does not change. Thus, Chen does not disclose performing a first type of transform in a first mode of operation and then, in a second mode of operation, performing a second type of operation ***that is an inverse transform relative to the first transform***. Accordingly, Chen fails to disclose each and every element of claim 9.

Claims 12 and 14-16 depend from claim 9. Accordingly, Chen fails to disclose each and every element of these claims, at least by virtue of their dependency on claim 9. Further, claims 12 and 14-16 recite additional elements not disclosed by Chen.

Claim 24 recites a system to "when in a first mode of operation, access one of the first table or the second table in a first manner to perform a first transform; and when in a second mode of operation, access one of the first table or the second table in a second manner to perform a second transform, wherein the second transform is an inverse transform relative to the first transform." As explained above, Chen does not disclose a system or method that performs a first transform in one mode of operation and a second transform in a second mode of operation wherein the second transform is an inverse transform relative to the first transform. Thus, Chen fails to disclose each and every element of claim 24.

Claims 25-27 depend from claim 24. Accordingly, Chen fails to disclose each and every element of these claims, at least by virtue of their dependency on claim 24. Further, claims 25-27 recite additional elements not disclosed by Chen.

In view of the forgoing, it is respectfully submitted that the anticipation rejection of claims 9, 10, 12-16 and 24-27 is improper. Withdrawal of this rejection and reconsideration of the claims therefore is respectfully requested.

Rejection of Claim 13

At page 3 of the Final Action, claim 13 was rejected to as failing to comply with the written description requirements. This rejection is respectfully traversed. One of ordinary skill in the art would understand the term "wherein motion estimation is performed to determine the type of data" as it is clear and unambiguous and would understand that this term is well supported in the specification, including on page 4, lines 16-26 of the Application. Further, the claim language itself is sufficient disclosure. Accordingly, withdrawal of the rejection to claim 13 is respectfully requested.

Conclusion

As discussed above, the Office fails to establish that the cited references disclose or suggest each and every element recited by any of the pending claims. Accordingly, reconsideration and withdrawal of these rejections is respectfully requested.

Respectfully submitted,

6/12/06
Date

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